DOCKET FILE COPY ORIGINAL

THE PRINCE GEORGE'S COUNTY GOVERNMENT

March 3, 1993

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Ms. Searcy:

The Prince George's County Government (MD) is pleased to offer the following comments regarding CFR 47, Part 88 as proposed. Prince George's County is located adjacent to the District of Columbia, has a population of approximately 700,000, and provides a full range of services for its citizens. Although we concur with the Commission that Part 90 should be revised, we are deeply concerned that the proposed revised rules, in conjunction with the proposed implementation schedule, will cause a great financial hardship for the County government and a reduction in our communications capabilities.

The Commission's estimate of the fiscal impact to the existing licensees caused by the adoption of Part 88 (as proposed) appears to be greatly understated. For example, the cost of making adjustments to the transmitter deviation of existing equipment is cited to be approximately $100.00 per unit. In Prince George's County, which currently operates in excess of 3000 transmitters, this cost alone would exceed $300,000.00. Additionally, the cost of replacing the reference oscillator crystals or crystal oscillators with the high stability type required for base station use (.1 ppm - 150 thru 512 Mhz) will incur an additional cost in excess of $50,000. The cost of changing to higher stability oscillators in our mobiles and portables will exceed $225,000. The cost of replacing existing receiver equipment necessitated by channel splitting has been essentially ignored in the Commission's estimates. In fact the Commission states that no protection from adjacent channel interference to receivers is provided.

Central Communications Facility, 7911 Anchor Street, Landover, Maryland 20785

All receivers will be affected by adjacent channel emissions since the receiver's typical bandwidth acceptance extends into the proposed adjacent channel. Even if Prince George's County did not replace its mobiles and portables, the cost to the County would exceed $200,000 to replace its existing auxiliary receiver systems necessitated by the use of portable radios. The estimated total cost , without replacing our mobiles and portables, will exceed three quarters of a million dollars.

Further fiscal impact will be caused by the necessity to replace or modify existing frequency calibration equipment. The proposed stability requirement for fixed or base transmitters is identical in most cases to that of existing test equipment (.1 ppm).

We are concerned about the extremely conservative approach used to formulate the Effective Radiated Power v. Height Above Average Terrain restrictions on power output. While we agree that many licensees exceed their service areas by a combination of antenna height and power, the limits proposed are too low to provide effective, reliable communications for public safety without the addition of more transmitter sites. A better proposal would in fact be to use the standard adopted in the NPSPAC plan, which uses service areas, signal strengths and percentages of reliability to determine the antenna height, effective radiated power and radiation patterns. The NPSPAC plan also addresses the adjacent and co-channel distances required which are not adequately addressed at 150 - 512 MHz in the new Part 88.

Simply reducing the deviation to narrow the bandwidth of transmission by current equipment will result in lower recovered audio and at least a 4 dB reduction in the signal to noise ratio of the received signal. Also of concern is the fact that commercial providers of paging services will be allowed to continue full deviation, full power transmission of paging signals, while those entities such as Prince George's County, who provide identical paging services in their daily operations, will be required to reduce bandwidth and power output or antenna height and thus reduce the effectiveness and efficiency of our systems. It would also appear that replacement of all existing paging receivers would be required.

Ms. Donna Searcy
March 3, 1993

The proposed plan to split the channels and at the same time intersperse dissimilar services throughout the bands essentially precludes the use of TDMA and other efficient transmission modes. The fact that the ultimate channel splitting scheme does not coincide with the narrow band standards adopted by the Federal government agencies precludes interoperability between their systems and ours. Additionally, the extremely narrow bandwidth does not allow the transmission of high speed data. It would also appear that the use of mobile relays would be precluded in the 150 - 174 MHz bands. Practically all of our "high band" systems utilize mobile relays.

Prince George's County respectfully requests that the Commission re-examine the proposed fiscal impact of Part 88, and give far greater consideration to the technical aspects of the proposal by the Commission. We suggest that an easier transition to compliance with Part 88 may possibly be facilitated by requiring that all equipment manufactured after 1995 comply or be compatible with the technical requirements (narrow banded) and that current licensees be allowed to gradually migrate toward compliance with the new requirements by the year 2004. This policy would allow political jurisdictions to fully "amortize" the cost of our existing equipment and make the necessary fiscal arrangements to purchase new, compliant equipment after 1995 which in turn would allow us to be fully compliant by 2004.

Thank you for the opportunity to express our concerns. If you have any questions, please contact me.

Sincerely,

Jonathan P. Bigony

Jonathan P. Bigony
Radio Systems Manager